

REMARKS

This amendment is responsive to the Office Action dated February 18, 2000. Claims 1-8 are pending in the application and are subject to rejection.

This amendment and response is being filed within the shortened statutory period and a Request for an Extension of Time is not necessary.

Please charge any additional fees or credit any overpayment to our Deposit Account No. 19-1995. A duplicate copy of this letter is enclosed for that purpose.

I. Claim Rejections – 35 USC §103(a)

The Office Action rejected **Claims 1, 2, 3, and 4** under §103(a) as being unpatentable over Corcoran. Applicants respectfully traverse the rejection of the claims, and the modification of Corcoran in applying the Section 103 rejection.

As to **Claim 1**, Applicants respectfully traverse the Office Action's assertion that Corcoran teaches the limitations of Applicants' claimed device or renders same obvious. The Office Action contends that Corcoran shows a method whereby a Network Browser displays four graphical buttons representing four devices from said list. Applicants have herewith amended Claim 1 to more clearly emphasize the novelty and unobviousness of Claim 1 over the cited references.

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In displaying the graphical object, Corcoran states that the user-interface for that device

does not originate from the local system software and “instead it is loaded, as a HiPlet, from an HTTP-style universal resource locator (URL).” (Corcoran p. 1065, section 3.3, second column). Conversely, Applicants’ claimed invention allows at least local access to the graphical object for controlling the desired device. Therefore, if the external network is not operating, or if the URL for the specific device is otherwise unavailable, Applicants’ claimed graphical object will still be displayed in an operable fashion. Whereas Corcoran’s graphical object would not function at all. Accordingly, Corcoran neither teaches nor renders obvious Applicants’ claimed limitation of local access to graphical objects of the connected devices.

In addition, the Office Action admits that Corcoran does not show Applicants’ claimed limitation of associating a hyper-text link to an HTML page of the specific device with the device button. However, the Office Action asserts that it would have been obvious to modify Corcoran to incorporate Applicants’ claimed limitation. Applicants respectfully traverse the proposed modification of the reference.

First, it is well settled that for a modification of the prior art to be proper, the prior art itself must provide a suggestion for that modification. The Office Action states that because Corcoran suggests the use of HTML by disclosing the use of HTTP, URLs, and the name “Network Browser,” that it would have been obvious to include hypertext linking to provide increased adaptability to Corcoran’s disclosed system.

Applicants’ respectfully traverse the Office Action’s assertion of proposed suggestion by Corcoran. The HTML and URLs disclosed by Corcoran are internal components of the system

that are required to download information from the device's homepage in order to make the device operable on the home network. Therefore, there would be no motivation for Corcoran to provide a separate hyper-text link as disclosed by Applicants claimed invention which would allow a user to access the HTML page of the device as the user desires.

Secondly, it would be necessary to make modifications not taught in or suggested by the prior art in order to combine the elements in the manner suggested. Corcoran mandates that the HTML page of the device be accessed in order to make the user-interface for that device functional on the network and would not need to provide a user the option of accessing the HTML page of the device as desired.

Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in Corcoran to achieve the claimed invention. Applicants respectfully submit that the fact that the modification produces advantages in the increased adaptability to the device taught by Corcoran militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 1 because all of the elements of the claimed invention are neither disclosed nor rendered obvious, and because the proposed modifications of Corcoran are not suggested within the prior art.

As to **Claim 2**, the Office Action asserts that Corcoran shows the methods of Applicants' claimed invention. Applicants respectfully traverse this proposition and assert that since Claim 2

incorporates the novel and unobvious limitations of Claim 1, it is therefore allowable for its dependency due to the reasons set forth above in relation to the rejection of Claim 1, as well as for its own novel sub-features. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 2.

As to **Claim 3**, the Office Action asserts that Corcoran shows the methods of Applicants' claimed invention. Applicants respectfully traverse this proposition and assert that since Claim 3 incorporates the novel and unobvious limitations of Claim 1, it is therefore allowable for its dependency due to the reasons set forth above in relation to the rejection of Claim 1, as well as for its own novel sub-features. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 3.

As to **Claim 4**, the Office Action asserts that Corcoran shows the implementation of a device GUI. Applicants' respectfully traverse the Office Actions' assertion and the rejection of Claim 4. Applicants' claimed limitation requires retrieving a device ICON image from a home device, which is a limitation neither anticipated by nor rendered obvious from Corcoran.

As discussed above in relation to Claim 1, Corcoran mandates that the user-interface for a device not originate from the local system, but be provided from the home page for the device via the Internet. Applicants' Claim 4 allows the user-interface information to be retrieved from the device at least locally in addition to external networks. Accordingly, Applicants' claimed invention provides assured and secure access to the user-interface on the local network and

eliminates the possible failure of the external network and interrupted access to the device.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 4 because the limitations thereof are neither anticipated by nor rendered obvious from Corcoran.

The Office Action rejected **Claims 5 and 7** under §103(a) as being unpatentable over Corcoran as applied to Claim 1, and further in view of Reber et al. (hereinafter Reber).

Applicants respectfully traverse the rejection and the modification and combination of Corcoran and Reber.

As to **Claim 5**, the Office Action contends that Corcoran shows displaying the user interfaces of specific devices and that it can be combined with the disclosure of Reber to display a logo image. Applicants respectfully traverse the Office Action's interpretation of the references and the combination thereof.

First, Applicants incorporate herein the remarks set forth above as to the novelty and unobviousness of Claim 1 in view of Corcoran. As discussed above, the Office action admits that the Corcoran user interface is loaded as a HiPlet from the HTTP-style URL of the devices homepage. Conversely, Applicants' claimed invention allows the user interface for a specific device to be loaded from the local network.

Secondly, it is well settled that for a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion for the asserted modification. The Office Action states that because Corcoran uses an HTTP-style URL to download a user interface and

Reber teaches a method of displaying a graphical logo relating to a device onto a browser screen, then it would have been obvious to combine the two references.

Applicants respectfully traverse the proposed combination and modification. Reber teaches advertising on a first web page by displaying a logo of a sponsor that is linked to the web page of the sponsor. Accordingly, because the user is already on the first web page, there would be no reason or motivation for Reber to provide a logo of the first web page that links to itself. Furthermore, because Corcoran already accesses the web page of the device to download information automatically, there would be no reason to provide a logo to do so. Therefore, because of the diverse functioning of Corcoran and Reber, there would be no motivation for the combination thereof to provide a LOGO as claimed by Applicants.

Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in Corcoran and Reber to achieve the claimed invention. The Office Action acknowledges that Applicants' LOGO provides increased device recognition and attempts to improperly combine Corcoran and Reber to achieve the advantages thereof. Applicants respectfully submit that the fact the modification produces advantages in increasing device recognition by using a LOGO militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 5 because the combination and modification of the references is improper and does not disclose all of the

claimed limitations thereof.

As to **Claim 7**, the Office Action asserts that Corcoran shows the importance of a manufacturers' flexibility to change and adapt the user interface. Applicants respectfully traverse the asserted rejection and the Office Action's interpretation of Corcoran in this manner. Applicants incorporate the remarks above set forth as to the novelty and unobviousness of Claims 1 and 5 from which Claim 7 depends. Furthermore, Corcoran does not show storing the manufacturer device button in a user definable area of the device link page, a limitation of Applicants' claimed invention. Accordingly, Applicants respectfully request withdrawal of the rejection of Claim 7.

The Office Action rejected **Claims 6 and 8** under §103(a) as being unpatentable over Corcoran as applied to Claim 1, and further in view of Venkatraman et al. (hereinafter Venkatraman). Applicants respectfully traverse the rejection, the modification and combination of Corcoran and Venkatraman, and the interpretation thereof.

As to **Claim 6**, Applicants incorporate herein the remarks above set forth as to the novelty and unobviousness of Claim 1 in view of Corcoran, in furtherance of which, the Office action acknowledges that the user interface is loaded as a HiPlet from the HTTP-style URL of the device homepage. Conversely, Applicants' claimed invention allows the user interface for a specific device to be at least loaded from the local network.

Secondly, it is well settled that for a modification or combination of the prior art to be

proper, the prior art itself must provide a suggestion therefor. Neither Corcoran nor Venkatraman suggests that the references be combined or modified in the manner proposed by the Office Action.

Thirdly, Venkatraman does not show all of the limitations of Applicants claimed invention. In fact, Venkatraman teaches away from Applicants' claimed invention by requiring that "A user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the devices 10 and 50-52 into the corresponding web browser application."
(Venkatraman, Column 7, lines 36-38)

Conversely, Applicants' claimed invention provides a session manager that determines the location and availability of the devices connected to the network in a dynamic fashion. Accordingly, even if the combination were legally justified, it would not teach all the limitations of Applicants claimed invention because the method of receiving a URL from a home device is admittedly not taught by Corcoran.

Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in Corcoran and Venkatraman to achieve the claimed invention. The Office Action admits that Applicants' method of providing of a URL associated with the device provides increased information selectivity. However, the Office Action then attempts to improperly combine Corcoran and Venkatraman to achieve the advantages thereof.

Applicants respectfully submit that the fact the modification produces admitted

advantages militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. In addition, because Corcoran mandates that the device information be directly downloaded from the home page of the device, there would be no motivation for providing a separate URL therefor.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 6 because the combination and modification of the references is improper and does not disclose all the limitations thereof.

As to **Claim 8**, Applicants incorporate herein the remarks above set forth as to the novelty and unobviousness of Claims 1 in view of Corcoran, in furtherance of which, the Office action acknowledges that the user interface is loaded as a HiPlet from the HTTP-style URL of the devices homepage. Conversely, Applicants' claimed invention allows the user interface for a specific device to be at least loaded from the local network.

Secondly, it is well settled that for a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion therefor. Neither Corcoran nor Venkatraman suggests that the references be combined or modified as proposed by the Office Action.

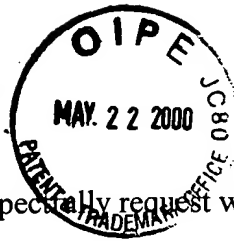
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Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in Corcoran and Venkatraman to achieve the claimed invention. The Office Action admits that Applicants’ method of providing of a URL from a properties file located on a home device allows itemized information gathering and provides increased space efficiency and attempts to improperly combine Corcoran and Venkatraman to achieve the advantages thereof.

Applicants respectfully submit that the fact the modification produces advantages in information gathering and storage space efficiency militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. In addition, because Corcoran mandates that the device information be directly downloaded from the home page of the device, there would be no motivation for providing a separate URL therefor.

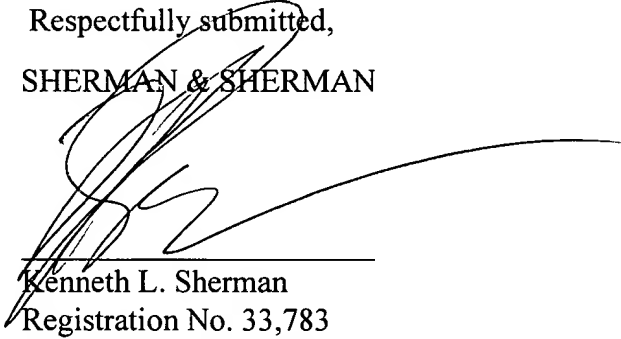


Therefore, Applicants respectfully request withdrawal of the rejection of Claim 8 because the combination and modification of the references is improper and does not disclose all the limitations thereof.

CONCLUSION

It is respectfully submitted that the case is now in condition for allowance, and an early notification of the same is requested. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

Respectfully submitted,
SHERMAN & SHERMAN


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I hereby certify that this correspondence is being deposited with the United States Postal Service first class mail in an envelope addressed to the: Commissioner for Patents and trademarks, Washington, D.C. 20231 on May 17, 2000.

Evelyn Menjivar

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